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**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
)	
Calpine Corporation, <u>et al.</u>,)	Case No. 05-60200 (BRL)
)	(Jointly Administered)
Debtors.)	
)	
<hr/>)	
Columbia Energy LLC,)	
)	
Plaintiff,)	
)	
v.)	Adv. Pro. No. 07-1694
)	
South Carolina Electric & Gas Company)	
)	
Defendant.)	
)	
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**MOTION OF SOUTH CAROLINA ELECTRIC & GAS COMPANY
TO WITHDRAW THE REFERENCE OF ADVERSARY PROCEEDING**

1. South Carolina Electric & Gas Company ("SCE&G"), by and through its undersigned counsel, hereby moves for the entry of an order pursuant to 28 U.S.C. § 157(d)

(the "Judicial Code") withdrawing the reference to the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court") of the adversary proceeding captioned Columbia Energy LLC v. South Carolina Electric & Gas Company, Adv. Proc. No. 07-1694 (the "Adversary Proceeding")

2. As set forth in the memorandum of law filed contemporaneously herewith, the adjudication of the Adversary Proceeding will require the consideration and resolution of substantial and material issues of non-title 11 federal law under (a) the Federal Power Act, 16 U.S.C. et. seq. (the "FPA"), (b) certain orders and directives issued by the Federal Energy Regulatory Commission (the "FERC") and (c) FERC regulated agreements between the parties. As a result, withdrawal of the reference of the Adversary Proceeding is mandatory under section 157(d) of the Judicial Code.

3. This motion shall not constitute a waiver by SCE&G of: (i) its right to trial by jury in any proceedings, cases or controversies related to the proceedings or case; or (ii) any other rights, claims, actions, defenses, setoffs and recoupments that SCE&G may be entitled to assert under agreements, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. SCE&G has made no prior request for any relief sought in this motion to this or any other court.

WHEREFORE, SCE&G respectfully requests the Court enter an order (i) withdrawing the reference of the Adversary Proceeding and (ii) granting any other relief the court deems just and proper.

Dated: June 1, 2007

Respectfully submitted,

/s/ Michael J. Templeton

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